

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF DELAWARE

JOHN DOHERTY,

Plaintiff,

v.

C.A. No. 04-370-SLR

STATE OF DELAWARE,
DEPARTMENT OF CORRECTION,
NOREEN RENARD, JOSEPH
PAESANI, JAMES LUPINETTI,
MICHAEL TIGUE, and ROBERT I.
GEORGE, JR.,

Defendants.

DECLARATION OF PHILLIP E. MORGAN

I, Philip E. Morgan, do state under the penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

1. I am employed by the Delaware Department of Correction and have been so employed since 1975. Presently, I am the Warden of the Plummer Community Corrections Center, on Todd's Lane, Wilmington, Delaware.

2. The plaintiff, John Doherty, through his supervisor Michael Cocuzza, reports to me.

3. The plaintiff has never requested reimbursement (in writing) for parking expenses involving his travel to the New Castle County Courthouse. Generally, employees arrange for other employees to shuttle them to the Courthouse.

4. The plaintiff has not requested requalification to carry a firearm by filling a form for that purpose through this office. The requalification procedures are well known and are scheduled on an ongoing basis for many employees.



Phillip E. Morgan